

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

AUTONAVIGARE LLC,

Plaintiff,

v.

TOYOTA MOTOR NORTH AMERICA,
INC. and TOYOTA MOTOR SALES,
U.S.A., INC.,

Defendants.

CIVIL ACTION NO. 4:25-cv-186-JRG

JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND STAY

Plaintiff AutoNavigare LLC, on the one hand, and Defendants Toyota Motor North America, Inc. and Toyota Motor Sales, U.S.A., Inc., on the other hand, move the Court to further extend the temporary stay of this case until Monday, June 30, 2025. The parties previously notified the Court that agreements in principle had been reached with third parties resolving the claims in this case. *See* ECF 55. The Court then entered its Order staying this case up to and including Monday, May 26, 2025. ECF 57. Plaintiff represents that it and the third parties have worked diligently to reduce their agreements in principle to final form and are close to final documents for signature. While the agreements are close to complete, the third parties are entities headquartered overseas, which is a factor that has caused some delays in the process.

For the foregoing reasons, the parties ask the Court to extend the stay up to and including Monday, June 30, 2025, by which time it is expected that the agreements will be fully executed and dismissal papers submitted for the Court's entry. A proposed order is included with this Motion for this purpose.

Dated: May 23, 2025

Respectfully submitted,

/s/ Edward R. Nelson III

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**Attorneys for Defendants Toyota Motor
North America, Inc. and Toyota Motor
Sales, USA, Inc.**

CERTIFICATE OF CONFERENCE

In accordance with Local Rule CV-7(h), the undersigned certifies that counsel for Plaintiff conferred with counsel for Defendant and the parties are in agreement as to the relief sought by this joint motion.

/s/ Edward R. Nelson III

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing was served on all parties of record on May 23, 2025 via the Court's CM/ECF system.

/s/ Edward R. Nelson III